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Attorneys for Defendant: MUHAMMAD MUDASSAR ANWAR  
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6  
7 **UNITED STATES DISTRICT COURT**  
8 **NORTHERN DISTRICT OF CALIFORNIA**  
9

10 AMAZON.COM, INC et al,  
11 Plaintiff,

12 vs.

13 MUHAMMAD MUDASSAR  
ANWAR, an individual, TECH DRIVE  
14 PVT, LLC, a New York Limited  
Liability Company, et al.

15 Defendants.  
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Case No.: 3:23-cv-05580-TLT-RI

**MUHAMMAD MUDASSAR  
ANWAR DECLARATION IN  
SUPPORT OF MOTION TO  
SETASIDE DEFAULT AND  
DISMISS CASE FOR LACK OF  
PERSONAL JURISDICTION**

Hearing

Date: February 25th, 2025

Time: 2:00 p.m.

Place: 450 Golden Gate Avenue,  
Courtroom #9 (19<sup>th</sup> Floor) San  
Francisco, CA 94102.

[Filed concurrently with notice of  
motion, proposed order and  
memorandum of points and authorities]

23 **MUHAMMAD MUDASSAR ANWAR DECLARATION IN SUPPORT OF**  
24 **MOTION TO SETASIDE DEFAULT AND DISMISS CASE FOR LACK OF**  
25 **PERSONAL JURISDICTION**  
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2 1. I, MUHAMMAD MUDASSAR ANWAR, hereby declare as follows:

3 I am the defendant named in this action. I make this declaration based on personal  
4 knowledge of the information contained in this declaration and, if called upon to  
5 do so, could competently testify to the information set forth in this declaration.  
6

7 2. I live in Scarsdale, New York and have for all times relevant to this  
8 complaint, for the last 7 years.  
9

10 3. I am the owner of Tech Drive PVT, also named as a Defendant in this case.

11 The company is located in New York at all relevant times, but is now closed.  
12

13 4. I deny the allegations made in the complaint.

14 5. I have never had any offices in California.

15 6. I do not do any business targeted to California.

16 7. I did not register the domain name they are accusing me of.  
17

18 8. I do not own any real estate or other property in California.

19 9. I have never had any employees, or agents in California.

20 10. I have never had any businesses running in California.  
21

22 11. I never created any websites as Plaintiff alleges, and never inserted a  
23 California address as Plaintiff claims.

24 12. I had no reason to believe I could be sued in California, and it would cause  
25 me great financial hardship to be forced to litigate this case in California.  
26

27 13. I am not the guilty party in this case as I was a victim of identity theft.  
28

1 14. I filed a police report with the New Rochelle police department. See  
2 attached **Exhibit “1”** for a true and correct of the police report.

3 15. I have never owned a 408-area code phone number and did not add this to  
4 any website.  
5

6 16. The reasons I did not hire an attorney earlier were that I was innocent and  
7 also in extreme financial hardship and I could not afford to hire an attorney  
8 to represent me.  
9

10 I declare under penalty of perjury under the Laws of the United States of  
11 America that the foregoing is true and accurate.

12 DATED this 10<sup>th</sup> day of 2025 at Scarsdale  
13 \_\_\_\_\_, New York.

14 

15 \_\_\_\_\_  
16 DECLARANT MUHAMMAD MUDASSAR ANWAR  
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# UP CRIME! DIAL 911 FOR EMER

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Albany, NY 12203-6383  
(518) 457-8727

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Broo

1-800-247-8035  
[www.cvb.state.ny.us](http://www.cvb.state.ny.us)  
TTY: 1-888-289-9747



**475 North Avenue**  
**New Rochelle, New York 10801**



# POLICE DEPARTMENT

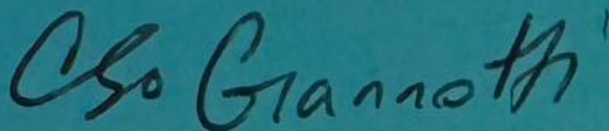
NEW ROCHELLE POLICE DEPARTMENT  
POLICE – FIRE – AMBULANCE

of your report,  
Please Call  
914-654-2235

Reports available  
at [buycrash.lexisnexisrisk.com](http://buycrash.lexisnexisrisk.com)  
30 days after accident.



POLICE COMMISSIONER



POLICE OFFICER

PO Bird  
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## NON EMERGENCIES

- ☒ **GENERAL INVESTIGATIONS UNIT**  
Homicides, rapes, assaults, robberies
- ☐ **PROPERTY THEFT UNIT**  
Burglaries, stolen property, criminal mischief, etc.
- ☐ **COMMUNITY POLICING**  
Youth Problems  
Community Resource Coordinator
- ☐ **RECORDS UNIT**  
Incident Reports  
Accident Reports
- ☐ **PROPERTY CLERK**
- ☐ **FORENSIC UNIT**
- ☐ **INTERNAL AFFAIRS UNIT**  
Employee complaints/ compliments
- ☐ **DISTRICT ATTORNEY'S OFFICE**